

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES Debtor.	§ § § § § §	Case No. 22-33553 (Chapter 7)
--	----------------------------	--

**ALEX E. JONES RESERVATION OF RIGHTS OF OBJECTIONS TO (I) THIRD
INTERIM FEE APPLICATION OF PORTER HEDGES, LLP (#1145); (II) THIRD
INTERIM FEE APPLICATION OF JONES MURRAY LLP (#1146); (III) FIRST
INTERIM FEE APPLICATION OF TPS-WEST LLC (#1149); AND (IV)
SECOND INTERIM FEE APPLICATION OF N&N FORENSICS, LLC (#1152)
TO THE PROFESSIONALS FINAL FEE APPLICATIONS**

Alexander E. Jones (“Jones”) individually and as a Debtor in his Chapter 7 case, files this RESERVATION OF RIGHTS to file and make Objections to (I) Third Interim Fee Application of Porter Hedges, LLP (#1145); (II) Third Interim Fee Application of Jones Murray LLP (#1146); (III) First Interim Fee Application of TPS-West LLC (#1149); and (IV) Second Interim Fee Application of N&N Forensics, LLC (#1152) (collectively the “Fee Parties”) at the time of any Final Fee Application seeking approval by final order of these fees. In support of its Reservation of Objection, Jones submits the following:

JURISDICTION & VENUE

1. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq., and after the Conversion Date, the Jones Chapter 7 Case.
2. On December 13, 2022, the United States Trustee for Region 7 (Southern and Western Districts of Texas) (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors in the Jones Chapter 11 Case pursuant to Bankruptcy Code section 1102(a)(1).

3. The Court has jurisdiction concerning this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), et seq. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

**RESERVATION OF ALL RIGHTS AND
OBJECTION & RELIEF REQUESTED**

4. Jones reserves all rights granted by the Bankruptcy Code and under federal and state law regarding the right to, and the grounds of, any objection to the compensation of the Fee Parties as professionals in a Title 11 case, until the Fee Parties timely and properly file their respective final professional fee applications seeking a final order for approval of all these (i) Attorneys or Professional fees and expenses, or (ii) any prior professional fees and expense applications; or (iii) any subsequent attorneys or professional fees and expense applications. Jones specifically preserves all rights to object in any manner and as to any aspect of the Fee Parties' applications, and all remedies available to Jones regarding the Fee Parties applications, including all appellate rights for all such Fee Parties applications and any orders, whether interim or final, regarding such Fee Parties applications or orders thereon.

WHEREFORE Jones respectfully requests that the Court reserve any final ruling of payment pursuant to the (I) Third Interim Fee Application of Porter Hedges, LLP (#1145); (II) Third Interim Fee Application of Jones Murray LLP (#1146); (III) First Interim Fee Application of TPS-West LLC (#1149); and (IV) Second Interim Fee Application of N&N Forensics, LLC (#1152), for the reasons set forth herein and based on arguments or evidence to be made or offered at any final hearing thereon, and for such other and further relief to which Alexander E. Jones may be justly entitled, both at law and in equity.

Dated: June 5, 2025

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 804
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
COUNSEL FOR ALEX JONES and FSS

BEN C. BROOCKS
State Bar No. 03058800
Federal Bar No. 94507
WILLIAM A. BROOCKS
St. Bar No. 24107577
Federal Bar No. 3759653
BROOCKS LAW FIRM PLLC
248 Addie Roy Road, Suite B301
Austin, Texas 78746
Phone: (512) 201-2000
Fax: (512) 201-2032
Email: bbroocks@broockslawfirm.com
CO-COUNSEL FOR ALEX JONES and FSS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties registered to receive notices via the Court's ECF noticing system on June 5, 2025.

/s/ Shelby A. Jordan
Shelby A. Jordan